

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE:

Clark E. Llewellyn
Martha G. Llewellyn
Debtors,

Case No. 09-25737
Chapter 13
Judge: Bruce W. Black

Potestivo & Associates, P.C.
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Our File No.: C14-13084

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RESPONSE TO TRUSTEE'S NOTICE OF FINAL CURE PAYMENT

NOW COMES Ocwen Loan Servicing, LLC as servicer for Wells Fargo Bank, N.A. as Indenture Trustee for GMACM Home Equity Notes 2004 Variable Funding Trust (herein "Creditor"), by and through their attorney, Potestivo & Associates, P.C., and states the following as their response disagreeing with the Trustee's Notice of Final Cure Payment that was filed on October 17, 2014:

1. The Debtors filed their bankruptcy petition on July 16, 2009.
2. The Trustee filed the Notice of Final Cure Payment pursuant to Rule 3002.1 on October 17, 2014.
3. The Debtor failed to make direct post petition payments when due. The loan is contractually due for October 20, 2010.
4. Creditor disagrees with the Notice of Final Cure Payment and Completion of Plan Payments.

Date: November 7, 2014

/s/ Caleb J. Halberg
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